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22 UNITED STATES DISTRICT COURT

23 DISTRICT OF ARIZONA

24 In Re Bard IVC Filters Products  
25 Liability Litigation

26 No. MD-15-02641-PHX-DGC

27 **MOTION TO FILE UNDER SEAL**

28 **(Filed *Ex Parte*)**

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and  
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee  
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and  
22 Local Civil Rule 5.6 for leave to file under seal CBFCC's Request to Distribute Funds for  
23 Fees and Expenses ("Request").

24 The Request pertains to a confidential hearing and contains confidential  
25 information relevant to all fee applicants. Furthermore, as the Court is aware, all filings  
26 related to the Common Benefit Fee and Cost Committee have been filed under seal in this  
27 litigation. Accordingly, good cause exists for sealing the Request.  
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2 RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of October 2022.

3 BEUS GILBERT MCGRODER PLLC

4  
5 By: /s/ Mark S. O'Connor

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28

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of October 2022, I electronically transmitted the attached document to the Court.

/s/ Jessica Gallentine